

POLLUTION CONTROL

106 Main Street South Portland, ME 04106 (207) 799-7377

December 28, 1982

Maine Department of Environmental Protection Raye Building State House Station 17 Augusta, Maine 04333

Attn:

Robert Demkowitz

Division of Oil & Hazardous Waste

Licensing & Enforcement

SUBJECT: Jet Line Pollution Control Training Program

Dear Bob:

Enclosed please find the Personnel Training and Health Protection Program now in force at Jet Line Pollution Control's facilities located at 106 Main Street, South Portland, Maine. You will note that this program is also applicable to our drivers, emergency response personnel, and other field activities.

It is our intent that the enclosed material and our implementation of the program as described will eliminate the deficiencies detected during DEP's inspection of our facilities and described in Douglass C. Gleason's letter to me dated July 29, 1982.

We trust that you will find our program complete and in compliance with 40CFR Section 265.16. However, should your review indicate any oversights please advise us immediately so that we can revise the program and its documentation.

Sincerely yours,

JET LINE POLLUTION CONTROL

Marc Guerin

General Manager

cc: Douglass C. Gleason, DEP - Portland office

Personnel Trawing

S. Pottard, ME

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SECTION I

INTRODUCTION

#### INTRODUCTION

Jet Line is New England's leading oil and hazardous material spill emergency response contractor.

Jet Line Pollution Control was established in Massachusetts in 1970 and in Maine in 1976. The company's primary business has been and remains clean-up, storage and shipment of all manner of petroleum distillates, oil spills, oily debris, and waste oils. To the maximum, practical extent, Jet Line reclaims and recycles these materials. Those incapable of reuse are disposed off-site in the most cost-effective manner that complies with all applicable federal, state and local laws, rules and regulations.

Jet Line's inventory of specialized equipment and expertise are also contracted to properly handle, recycle, and dispose of a broad spectrum of spent or spilled chemicals in solid and liquid states. While these situations generally involve small volumes relative to our oil contracts, each project is unique. Personal safety and environmental protection dictates a well informed, cautionary and expeditious approach.

Jet Line's primary role in all of our contracts is that of transporter. However, emergency response often requires procedures whereby the properties of antagonist materials are changed in order to expedite their safe handling. Neutralizing an acid spill and applying sorbent to petroleum products are typical examples. Other examples include repacking drums, combining compatible small quantities to effect shipping economics and developing appropriate procedures to clean residues in Jet Line equipment or sludges from a customer's bulk storage tanks.

In all of this, Jet Line recognizes its responsibility to employees and the environment. As our business evolves we continuously upgrade our personnel, equipment and procedures in order to remain the undisputed leader in our field. To do this, we also recognize the need to continue our established performance record and our mutually beneficial relationship with agencies responsible for regulatory oversight.

Training Jet Line personnel in the proper use of safety equipment and proper procedures is an ongoing task that receives priority attention. Our program has been designed to respond to the changes necessitated by our growing business. This document describes the comprehensive but practical nature of our training program.

SECTION II
PROGRAM OVERVIEW

#### PROGRAM OVERVIEW

Jet Line Pollution Control has developed a training program that is compatible with 40CFR Part 265.16 requirements and that assures personnel safety through a health program operated by the Maine Poison Control Center located at Maine Medical Center in Portland, Maine. An overview of Jet Line's Personnel Training Program (JPTP) is as follows:

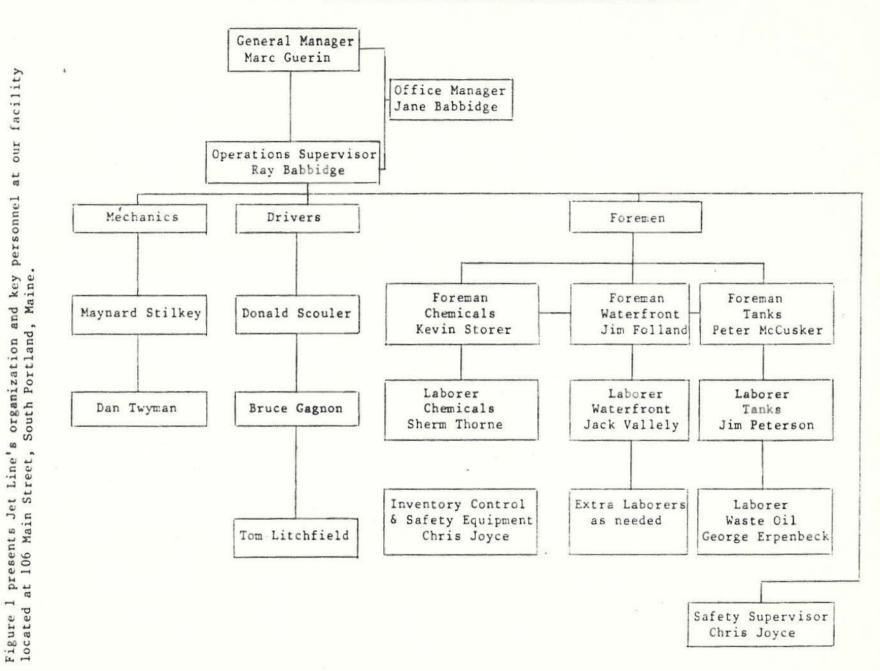
- Field personnel, drivers, and facility operators must successfully complete a program of classroom instruction and on-the-job training designed to teach them how to safely use Jet Line equipment and proper procedures in the conduct of Jet Line business activities.
- 2. The JPTP shall be directed by a person trained in oil spill containment, tank cleaning, transportation procedures, environmental protection, and hazardous waste management. This person shall also be trained in implementation of contingency plans appropriate to Jet Line facilities.
- 3. At a minimum the program has been designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including where applicable:
  - Procedures for using, inspecting, repairing, and replacing operational and facility emergency and monitoring equipment;
  - b. Key elements for automatic waste feed cut-off systems;
  - c. Communications and alarm systems;
  - d. Response to fire or explosions;
  - e. Response to groundwater or surface water contamination incidents;
  - f. Proper job or facility shutdown procedures; and
  - g. Application of emergency first aid at the job site or the facility.
- 4. All personnel shall have completed the program within six months of hiring in the case of new employees or within three months in the case of an existing employee changing jobs within the company. In addition:
  - a. No employee shall undertake any dangerous contract work or facility projects in an unsupervised position without first completing three months of on-the-job training supervised by experienced and trained personnel;
  - b. No employee shall work continuously for more than six hours in any twenty-four hour period on any project that requires wearing full protective equipment in a hazardous environment and heavy labor;
  - c. Entry into confined spaces shall be in accordance with applicable OSHA standards and guidelines; and

- d. Tank cleaning shall be in accordance with procedures set forth in API Publication #2015.
- 5. All personnel shall participate in an annual review of their initial training required in paragraphs 1, 2, 3, and 4 above.
- 6. Supervisory personnel shall, at a minimum, participate in one appropriate oil and hazardous waste emergency response seminar sponsored by one or more government agencies with regulatory oversight at least once per calendar year.
- 7. In support of the Training Program, Jet Line facility managers shall maintain current records in an orderly and accessible manner as follows:
  - a. The job title for each position related to waste oil or hazardous waste management and the name of the employee filling each job;
  - b. A written job description for each position listed under paragraph 7(a) and shall include adequate specificity regarding the job function, employee duties and responsibility, requisite skill, education or other qualifications of each employee assigned to each position;
  - and continuing training that will be given to each person filling a position described in paragraph 7(b); and
  - d. Maintenance of training records shall be current for existing personnel and shall be maintained for at least three years from the date of separation of former employees. Training records shall accompany each employee who transfers within the company to a similar or new position.

Jet Line Pollution Control reviews the general and specific aspects of the Training Program at least once each calendar year. Changes are implemented as necessary to maintain program requirements compatible with current business needs and changes in regulatory requirements.

# SECTION III

JET LINE POLLUTION CONTROL ORGANIZATION CHART



SECTION IV
PERSONNEL JOB DESCRIPTIONS

#### PERSONNEL JOB DESCRIPTIONS

Key positions and current assignments at Jet Line Pollution Control's South Portland, Maine facility are as follows:

General Manager

-Marc Guerin - Overall responsibility for managing all aspects of company business for the Maine branch. Duties include personnel management, budget management, coordination of all oil and hazardous waste activities, security of company property, job bidding and invoicing, enforcement of company rules, policies, etc.

Operations Supervisor

-Ray Babbidge - Overall responsibility for directing the field activities of the Maine branch. Duties include supervision of all field personnel, supervision of repair and maintenance of company property, enforcement of personnel safety rules, policies etc., completion and implementation of contingency plans and procedures, establishment and coordination of training programs, bidding jobs and inventory control.

Safety Supervisor

-Chris Joyce - Overall responsibility for care of company's safety gear inventory. Duties include record keeping, repair and maintenance of equipment, security of gear, cleaning gear and inventory control for disposable items. All stationary safety equipment, i.e., fire extinguishers, eye wash stations, etc., are his responsibility as well.

Office Manager

-Jane Babbidge - Overall administrative responsibility for Maine branch. Duties include typing, invoicing, record keeping, payroll, filing, and purchasing of supplies.

Foreman, Chemicals

-Kevin Storer - Overall responsibility for on the job supervision of personnel who work with chemicals for Maine branch. Duties include safety of men on the job, coordination of logistics, manifest preparation, cleaning of chemical tanks following applicable state and federal standards, and custome relations.

Foreman, Waterfront

-Jim Folland - Overall responsibility for waterfront activitie for Maine branch. Duties include repair and maintenance of company boats, boom, barges, etc., supervision of personnel, safety of men on the job, coordination of logistics, operation of large boats, care of dock facilities, and customer relations.

Foreman, Tanks

-Pete McCusker - Overall responsibility for on the job supervision of personnel who clean tanks for the Maine branch Duties include upkeep and repair of all tank cleaning equipment, safety of men on the job, supervision of personnel and customer relations.

Mechanic

-Maynard Stilkey - Overall responsibility for proper operation of vehicles and equipment at the Maine branch. Duties includ overall creaminess of shop, repair of inoperative equipment, care and security of company tools, security and upkeep of parts inventory, and other similar duties as needed.

Mechanic

-Dan Twyman - Repair and maintenance of heavy equipment.

Duties include record keeping, preventive maintenance, and other similar duties as needed.

Shop Utility Man

-George Erpenbeck - Overall responsibility for condition of waste oil facility, hazardous waste storage site and waste absorbent dumpster. Duties include keeping records of all materials moved in or out of these facilities, tagging materials, security of site(s), and other related functions as needed.

Drivers (3)

-Overall responsibility for proper operation of company vacuum trucks. Duties include transportation vehicle and cargo to assigned locations, operation of diesel, compressor, tank and hose, and other duties as assigned.

Laborers (as needed)

-Overall responsibility for carrying out orders of supervisory personnel. Duties include all types of manual labor as assigned.

SECTION V
TRAINING PROGRAMS

#### TRAINING PROGRAMS

#### GENERAL FORMAT

Jet Line Training Programs have been designed to fulfill the functional requirements of each job classification. As such, they closely follow Jet Line's Organization Chart found in Section III, Figure 1. Figure 2 presents a functional organization chart for various training programs. In general, all employees must complete a minimum of forty hours of classroom and three months of closely supervised on-the-job training.

Classroom training consists of a series of lectures and presentations by recognized experts in oil and hazardous materials spill control and clean-up, tank cleaning, drum handling, site reclamation, personal safety procedures, and environmental protection-especially water resources protection. Presentation includes an introduction and evaluation of:

- o The regulatory framework (EPA, DOT, Coast Guard, health agencies).
- o Physical and chemical properties of petroleum and various distillates commonly encountered in job situations.
- Physical and chemical properties of hazardous materials commonly encountered in job situations.
- o Proper handling of petroleum distillates and hazardous materials, particularly with regard to emergency response to spills and fires.
- o Proper operation, maintenance and repair procedures for all facilities and equipment owned by Jet Line with special emphasis on fire protection, alarms, spill containment, remote communications, and personal safety equipment.
- o Proper project pre-planning procedures and real world interface.
- o Proper manifest procedures.
- o Key library information and reference documents readily available at Jet Line's facility and additional comprehensive information available by telephone from the Maine Poison Control Center.
- o The critical role of Jet Line's Material Safety Data Sheets and their proper completion and utilization.
- o Emergency first aid procedures.
- o A review of Jet Line's health monitoring and personal protection program.
- o The elements of personal and environmental risks inherent in Jet Line's contracts.

Much of Jet Line's classroom program draws upon similar programs offered by the USEPA, USDOT, Coast Guard and State Fire Marshal's Office. References typically drawn upon for guidance include:

> USEPA Rules and Regulations USDOT Rules and Regulations US Coast Guard Rules and Regulations OSHA Rules and Regulations

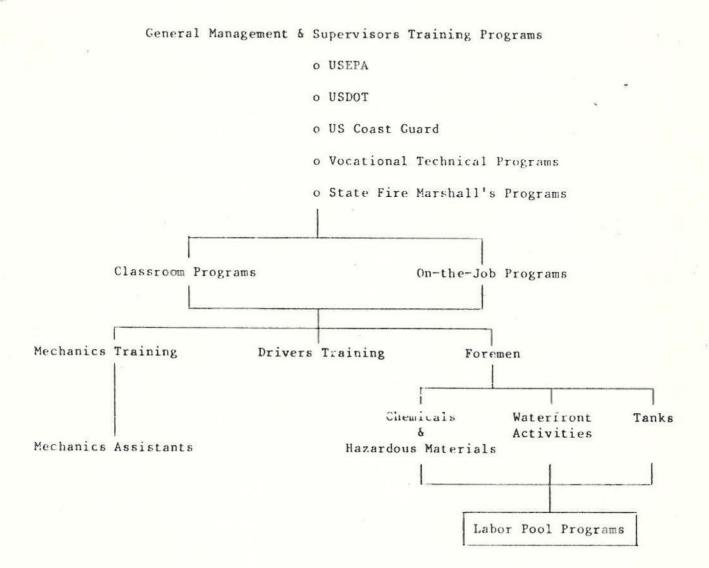
American Petroleum Institute Manuals
Chemical Hazard Response Information System (CHRIS) Manuals
The Handbook of Hazardous Waste Management by Arvin A. Metry, Phd, PE
The Chemical Engineers Handbook
Dangerous Properties of Industrial Materials, Fifth Edition by
N. Irving box

To a very great extent the classroom training is introductory and tailored to the individual needs in particular job situations. Because there is no good substitute for practical experience and because Jet Line is essentially an emergency response contractor to government and industry, the bulk of the Jet Line Training Program consists of closely supervised on-the-job training that emphasizes the real-world practicality of unique equipment applications to ever increasingly difficult tasks. Only Jet Line's most knowledgeable and experienced staff are permitted to participate in the most dangerous and environmentally sensitive projects. Only as competence is demonstrated are employees assigned relatively more complex tasks - and then only in a closely supervised capacity.

One of the most important elements of our OJT that is essential to job safety is the proper operation, maintenance, and repair of Jet Line's extensive inventory of specialized equipment. Every employee is introduced to every aspect of every piece of equipment presented in Table 1 and Table 2. Sometime during the first three months of employment, competence must be demonstrated in each case as appropriate to the individual assignment.

Outlines of training programs typical of Jet line's programs follows.

# FIGURE 2 - TRAINING PROGRAM ORGANIZATION CHART



# TABLE 1 - EQUIPMENT USED IN JET LINE'S OIL BUSINESS

Vacuum Tractor Trailer Trucks Vacuum Trucks (Straight) Portable Skid Mount Vacuum System Pickup Trucks, Econovans, Autos Stake, Service, Crew Cab, Van Type Trucks Four Wheel Drive Utility Trucks Tractors Trailers (Box, Low-bed, Flat-bed, Dump, Tanker) Tank Tractor Trailer Truck with Pumps Dump Truck (6 Wheel) Dump Truck (10 Wheel) Vacuum Separator Barge (10,500 gallon) Vacuum Barge (8,500 gallon) (portable) Boom Barge Harbor Tugs Work Coat/with motor Work Boat/without motor Powered Work Boats Hydro Blaster (10,000 psi) Air Compressor Hotsy (1,000 psi) (200°F) Cold Water Hotsy 680 Case Backhoe/Front-end Loader Bobcat Pittman Crane Truck Trailer Mounted Generator Generator (5 kW) (Portable) Portable Boiler Welding Machines Torches High Volume Transfer Pumps - 3" High Pressure Pump - 2" (Hale Pump) 2" Air Pump 3" Air Pump 4" Trash Pump Quick Response Van (Fully Equipped) Equipment/Supply Trailers Spill Trailers (Small) Spill Trailers (Box) Long Haul Trailer Duckbill Skimmers Swiss Skimmers Slurp Skimmers Skim Pack Magnetic Boom Attachments Bio-Pak (Self Contained Breathing Equipment) Escape Pack Four Man Mine Safety Respirator Kits Canister/Mask Respirator Additional Canisters Explosion Proof Test Meter

# (Table 1 - Cont'd)

Explosion Proof Tank Emergency Light Units/Stands Chain Saws Gas Driven Brush Cutter Jack Hammers Assorted Hand Tools Hand/Portable Radios Mobile Repair Facility Personnel Bus Office Trailer 8" Vactor Pipe (10' lengths) 6" Discharge Hose (50' lengths) 2", 3", 4" Vacuum Hose (20' lengths) 3/4" Air Hose (50' lengths) 14" Hose (50' lengths) 3/4" Steam Hose (50' lengths) All Other Hose

# TABLE 2 - EQUIPMENT USED PRIMARILY IN JET LINE'S HAZARDOUS MATERIALS BUSINESS

# Recovery Equipment (4 hour minimum)

Vactor (16 cu yd wet/dry - 4500 cfm)
Lined/Stainless Vacuum Truck
Vacuum Truck
Portable Skid-Mount Vacuum System
Hazardous Materials Response Van
Hazardous Materials Spill Trailer
Hastelloy/Teflon Diaphragm Pump
Stainless Steel Transfer Pump
Stainless Steel Drum Pump
Chemical Resistant Hose
Ferro-Magnetic Detector
Field Test Kit
HNU Photo-Ionizer

# Protective Equipment

Hazardous Environment Entry Suits
Chemical Protective Suit
Corrosive Protective Suits W/Full Hood
Mine Safety Respirator Kit
Self Contained Breathing Equipment
Positive Pressure Supplied Air System
Cascade Recharge System
PVC Splash Suits
Expendable Coveralls
Protective Boots
Protective Gloves
Organic Vapor Respirators
Canister Mask Respirators
Escape Pack

#### Heavy Equipment

Caterpillar 97 Shoveldozer Caterpillar 966 Loader Caterpillar 955 Shoveldozer Case 680 Backhoe/Loader Case 450 Shoveldozer Bobcat Tractor Trailer (Box, Low-Bed, Dump, Flat-Bed, Tank)

## Support Equipment

Twin-Engine Aircraft
Mobile Communications/Command Post
Office Trailer
Mobile Lab/Decon. Trailer
Portable Hydraulic Drum Crusher
Pittmam Crane Truck

(Table 2 - Cont'd)

Hotsy Blaster (200°F/1200 psi) Air Compressor Portable Generator

Misc. Equipment

Pickup Trucks/Autos Crewcab/Stake Trucks 4WD Vehicles

### OIL POLLUTION CONTROL COURSE OUTLINE

This course is presented by the general manager who is assisted by the operations supervisor, the safety supervisor, and foremen depending on the target employee level. The program is presented as follows:

#### A. PROPERTIES AND CHARACTERISTICS OF OIL

- 1. Pour Point
- 2. Specific Gravity
- 3. Oil Spreading
- 4. Oil Evaporation
- 5. Ignition and Combustion
- 6. Containment of Flammable/Combustible Spills
- 7. Safety Considerations
- 8. Environmental Concerns

## B. SPILLS OF OIL ON LAND

- 1. Soil Characteristics
- 2. Chracteristics of Oil Movement on Land
- 3. Vertical Oil Movement
- 4. Worizontal Oil Movement
- 5. Safety Considerations
- 6. Environmental Concerns

### C. CONTAINMENT AND RECOVERY OF OIL ON LAND

- 1. Oil Moving Horizontally on Land
- 2. Dil Sorbed by Soil Above the Water Table
- 3. Dil Contamination in Groundwater of Little Horizontal Movement
- 4. Oil Contamination in Groundwater of Active Horizontal Movement
- 5. Oil Spills in Underground Nonconformities
- 6. \$horeline Cleanup Techniques
- 7. Equipment Applications, Maintenance and Repair
- 8. Safety Considerations
- 9. Environmental Protection

## D. SPILLS OF OIL ON WATER

- 1. Wind and Current Factors
- 2. Prediction of Spill Movement
- 3. procedure for Calculating Spill Drift
- 4. Creek and River Spills
- 5. Spill Movement in Bays, lakes and Estuaries
- 6. Safety Considerations
- 7. Environmental Concerns

# E. CONTAINMENT OF OIL ON WATER

#### 1. Containment Boom

- a. Basic boom components and their function
- b. Physical factors affecting a boom
- c. logistical factors affecting a boom

- d. Spills in streams and creeks
- e. Spills in estuaries and marine environments
- f. Booming techniques near shore
- g. Spills around docks and floating objects
- h. Cold weather cleanup
- i. Equipment maintenance and repair

# 2. Anchor Strategies

- a. Anchoring techniques
- b. Practical advice
- c. High current boom

# 3. Impromptu Spill Containment Devices

- a. Wiers
- b. Filter fences

### F. CLEANUP OF OIL ON WATER

#### 1. Sorbents

- a. Properties of sorbents
- b. Sorbent type and packaging
- c. How and when sorbents are used
- d. Handling and disposal of contaminated sorbents

#### 2. Skimmers

- a. Basic skimmer concepts
- b. Type advantages and disadvantages
- c. Logistical factors affecting a skimmer
- d. Practical advice

## 3. Dispersants/Surfactants/Chemicals

- a. Type and use of chemicals
- b. Rules for using chemicals
- c. Practical advice

#### 4. Communications

- a. Components of spill response communication strategies
- b. Alerting systems and systems used during cleanup operations
- c. Rules for using communication equipment
- d. Practical advice

#### 5. Contractors

- a. Services offered by contractors
- b. The role of the contractor
- c. Practical advice

# EMERGENCY PROCEDURES

In the event of a spill the driver shall do the following:

- 1. If a phone is readily available the driver shall:
  - a. notify local officials
  - b. notify company office
  - c. notify state and federal government

and supply them with the following information:

- a. name and phone number of reporter
- b. location of incident
- c. time and type of incident
- d. name and quantity of materials involved
- e. any injuries
- f. possible hazards to population or environment
- 2. If a phone is not readily available the driver should stop a passing motorist and instruct him to immediately notify local officials of the situation and have them respond to the site.
- He must then ascertain what effect the spillage will immediately have to human health and the environment.
- 4. If there is any immediate action that can be taken to prevent environmental damage he shall try to the best of his ability to prevent it.
- If in his opinion the area should be evacuated he should notify local officials on their arrival.
- 6. The driver shall assist local officials in any way possible until the emergency is over.
- The driver must submit to the Regional Administrator of the USEPA within 15 days of the incident a written accident report.

# EMERGENCY PHONE NUMBERS

Call the nearest Jet Line office

- 1. 207-799-0850 24 hour So. Portland, ME
- 2. 617-843-2829 24 hour Stoughton, MA
- 3. Key personnel
  - a. So. Portland, ME

 Marc Guerin
 207-622-9107

 Ray Babbidge
 207-829-3253

 Kevin Storer
 207-829-5109

Chris Joyce
James Folland
John Vallely
Tom Litchfield
Kevin Storer
Don Scouler
Bruce Gagnon
Marc Guerin

Safety Supervisor Foreman Driver Driver Foreman Driver Driver General Manager

A copy of a drivers manual is attached to this section as it contains all the instructions and telephone contacts etc. that are required to be listed here.

3. Drivers are made aware of the procedures to be taken should an accident occur to protect their own safety. Aside from that drivers are not instructed in remedial actions. Drivers are aware of the State and Federal reporting requirements.

# B. Preparedness and Prevention:

- All vehicles transporting hazardous wastes are equipped with company owned 2-way radios and/or citizens band radios.
- Each vehicle carries a portable CO<sub>2</sub> or dry chemical fire extinguisher located in the cab.
- Jet Line has a copy of its operating plan on file with the South Portland Fire Department (copy attached).

# C. Contingency Plan and Emergency Procedures:

See Drivers Manual in Planning and Training Section.

# G. REGULATORY AND LEGAL CONSIDERATIONS

- 1. Important Spill Prevention Regulations
- 2. Important Oil Spill Laws and Regulations
- 3. Roles
- 4. Practical Advice
- 5. Documenting/Sampling

#### H. CONTINGENCY PLANS

- 1. Type of Information
- 2. Organization for Implementation of the Plan
- 3. Activation
- 4. Practical Advice

#### DRIVER TRAINING COURSE OUTLINE

The emphasis of Jet Line training is related to transportation issues because these are the issues most dramatically affecting the mainstay of the company's business. The program is as follows:

# A. Classroom Instruction and On The Job Training:

 The general manager of Jet Line in Maine has attended several hazardous waste training programs and acts as the person responsible for maintaining compliance for the company in the areas of planning and training.

Jet Line holds (1) monthly meeting for all drivers. The purpose of this meeting is to provide updates about applicable rules and regulations pertaining to the conveyance of hazardous wastes.

When a driver first comes to work at Jet Line he is required to attend a formal short course on DOT and EPA rules offered by a number of competent consulting/teaching firms. Of course if the driver already has completed one of these seminars he does not have to attend.

Also, Jet Line takes advantage of every opportunity in real world situations (on the job) to pass information to as many people as possible whenever there is a chance to learn something.

2. The company supplies the drivers with relevant technical information about the materials that they shall be carrying prior to the job. Copies of emergency guides from the Hazardous Materials 1980 Emergency Response Guidebook DOT P5800.2 are provided to every driver on every trip so that in the event of an emergency the technical information on safety procedures is readily available.

Each licensed conveyance is driven by a licensed driver only. The drivers licensed to transport hazardous wastes for Jet Line in Maine are:

Peter McCusker Raymond Babbidge Driver Operations Supervisor

# b. Stoughton, MA

Gerry Mayo	617-587-9107				
Doug Parsons	617-580-0523				
Bruce Bentham	617-344-2736				
Federal Reporting #	1-800-424-8802				
USEPA - Region I	1-617-223-7265				
or	1-617-861-6700				
State of ME	1-800-482-0777				
State of NH	1-603-271-3503	(days)			
	1-603-271-3636	(nights	&	holidays)	
State of MA	1-617-727-6373	(days)			
	1-617-566-4500	(nights	&	holidays)	

From time to time Jet Line personnel who are licensed to transport hazardous wastes are required to handle and transport drums of these materials.

In order to ensure that these activities are always undertaken in a safe and professional manner the following procedures and contingencies are required of all Jet Lime personnel.

#### PICKING UP DRUMMED MATERIALS FROM THE SMALL GENERATOR

Generally this process involves driving one of Jet Line's licensed conveyances to a small factory or plant to pick up less than (5) - 55-gallon drums.

The operations supervisor working in conjunction with the safety supervisor shall complete Material Safety Data Sheets and review these with the driver and other field personnel prior to proceeding to the job site.

The driver shall make contact with someone in authority at the plant before any drums are handled.

The driver or other senior field personnel shall ascertain if laboratory analyses have been performed on the drummed material and will obtain a copy of same to compare with Material Safety Data Sheets and for Jet Line records.

The driver must ensure that the drums are properly labeled and that there are no leaks or bulging drums.

The driver must inform the client that, even though there is no manifest required a receipt or bill of lading must be provided such that Jet Line has written proof of where the materials originated.

The client must ensure that the drums are readily accessible to Jet Line personnel and, if loading the drums can't occur until other objects are moved out of the way. Jet Line personnel are required only to ask the client to move the obstructions. The drivers are required to report any delays longer than (1) hour to the office that occur due to inaccessible drums.

Jet Line personnel shall load the drums on licensed trucks only. Before loading begins the most senior Jet Line employee shall ensure that all appropriate safety gear is on hand and is being used properly.

The drums must display the appropriate placards on Jet Line's vehicle prior to departing from the client's property.

#### PICKING UP DRUMMED MATERIALS FROM LARGE GENERATORS

The procedures are the same for the driver who picks up wastes from small generators with one important difference, the senior Jet Line employee shall ensure that a completed, signed manifest is available from the client prior to loading the materials. The only exception to this is when the driver is supplied with a manifest prior to leaving for his destination.

#### PICKING UP BULK HAZARDOUS WASTES

The driver should always contact the person in authority at the facility prior to connecting up to any tank or fitting.

The driver shall ensure that a completed, signed, manifest is provided by the client prior to loading the materials.

The driver shall exercise caution when loading the materials. The driver shall be responsible to see that the transfer hose and fittings are in good condition and compatible with the materials being handled.

If at any time the driver suspects that the material is behaving in a manner other than what he was told to expect from his Material Safety Data Sheets and project planning session, he should cease transferring immediately and not resume again until he is assured that every thing is correct.

Appropriate safety gear shall be on hand in the Jet Line vehicle prior to handling or transport of any bulk liquids.

#### CONTINGENCY PLAN

ALL spills of hazardous materials and/or waste must be reported to the state and federal government regardless of the volume involved.

In all cases, the driver involved should report any accidents or spills to Jet Line headquarters in South Portland.

As transportation of these hazardous materials and wastes often involve crossing state lines there are several spill reporting numbers that must be available to the driver. These are:

Federal	1-800-424-8802
USEPA - Region I	1-617-223-7265
or	1-617-861-6700
State of ME	1-800-482-0777
State of NH	1-603-271-3503 (days)
	1-603-271-3636 (nights & holidays)
State of MA .	1-617-727-6373 (days)
	1-617-566-4500 (nights & holidays)

#### Jet Line Personnel with Training on Hazardous Wastes:

Name	Title	Home Phone
Marc Guerin	General Manager	622-9107
Ray Babbidge	Operations Supervisor	829-3253
Bruce Gagnon	Foreman	797-6204
Kevin Storer	Foreman	774-7946
Peter McCusker	Laborer	772-4206
Don Scouler	Truck Driver	247-6715

Business Phone - 24 hr number

Toll Free Maine Number

207-799-0850

1-800-492-0545

SECTION VI TRAINING RECORDS

#### TRAINING RECORDS

A permanent record of all training received by each Jet Line Pollution Control employee shall be maintained as an integral part of each employee file. In addition, the office supervisor shall maintain a current summary of employee training activities on file with the Hazardous Waste Contingency Plan and the Oil Spill Prevention Control and Countermeasures Plan. These records shall-be updated quarterly for current employees and shall be maintained on file for a minimum of three years for former employees.

Training records shall be prepared on the standard form presented here as Figure 3.

# IGURE 3 - EMPLOYEE TRAINING REC )

IV. List all other positions held while with Jet Line Pollution Control:    1.	I.	Employee Name:		Date First Employed:	
II. Years of Relevant Experience: Telephone Number:  III. Current Position:  IV. List all other positions held while with Jet Line Pollution Control:  1.	6	Address:		Departure Date:	
IV. List all other positions held while with Jet Line Pollution Control:  1.		Telephone Number:	Forwar	ding Address:	
2. 6. 3. 7. 4. 8.  V. Formal Education:  VI. Specialized Skills:  VII. Relevant Experience While with Other Employers:  VII. Title Beginning Date Completion Date Completion Date Beginning Date Completion Date Compl	Il.	Years of Relevant Experi	ence:	Telephone Number:	
1. 5. 2. 6. 3. 7. 4. 8.  V. Formal Education:  VI. Specialized Skills:  VII. Relevant Experience While with Other Employers:  VII. Relevant Experience Maginning Date Completion Date Completion Date Beginning Date Completion Date	III.	Current Position:			
2. 6. 3. 7. 4. 8.  V. Formal Education:  VI. Specialized Skills:  VII. Relevant Experience While with Other Employers:  VII. Title Beginning Date Completion Date Completion Date Beginning Date Completion Date Compl	IV.	List all other positions	held while with Jet Line Po	Ollution Control:	
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NOTE: Use additional sheets as necessary.

# FIGURE 3 Ontinued) EMPLOYEE EXPERIENCE

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Temporary Storage Facility for Hazardous Wastes

Jet Line Pollution Control 106 Main St. So. Portland, ME 04106

# INTRODUCTION

Jet Line Pollution Control operates a licensed hazardous waste temporary storage facility at 106 Main Street, South Portland, Maine.

Jet Line Pollution Control is also fully licensed to transport hazardous wastes in Maine, New Hampshire, Vermont, Connecticut, Rhode Island, Massachusetts, New York, and New Jersey.

Jet Line picks up and transports drummed hazardous wastes from time to time in small quantities as part of the services offered to their clients. All hazardous wastes picked up by Jet Line are altimately transported to licensed treatment/storage or disposal facilities in or out of state.

There are considerations that arise in the normal course of business when it is best to pick up wastes from a client that will be stored at Jet Line's temporary storage facility pending final disposal.

Jet Line has developed a safe storage facility design for drummed wastes that fall into the following EPA waste catagories.

General Categories: DOO1, DOO2, DOO3, DOO4

Non Specific Sources: F001, F002, F003, F004, F005, F006, F007, F008, F009, F010, F011, F012, F013, F014, F015

Specific Sources: KO49, KO51, KO52

There are no facilities for storing hazardous wastes in bulk at this location and there are no plans to do so in the future.

This storage facility is operated according to all applicable local, state, and federal standards.